Application No. 09/517,364 Amendment dated Ocotber 12, 2005 Reply to Office action of September 9, 2005

## REMARKS

Claims 1-24 are pending in the application after this amendment.

Incorporated herein (without repetition except as absolutely necessary) are the specific recitation of the facts and the specific arguments found in previous papers.

The Examiner rejected claims 6 and 8 under 35 USC §112, first paragraph. Specifically, the Examiner states that these claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention. Applicant respectfully disagrees. The original application includes the following text at page 6, lines 17-22: "If a HIT occurs, an optional efficiency check may be performed to determine whether the "print image" should be re-rendered or printed using cached data 130. This determination would most likely be based on such exemplary factors as the size of the "print image" and the speed of the host computer and printer. If the efficiency check determines it would be more efficient to re-render, the procedure associated with a MISS as set forth below is followed." (Emphasis added.) This rejection should be withdrawn.

The Examiner has rejected claims 1-3, 9-10, 12-13, and 21-23 under 35 USC §103 as being unpatentable over U.S. Patent No. 6,819,445 to Stevenson et al. (the "Stevenson reference") in view of U.S. Patent Application No. 2005/0172124 to Carpentier et al. (the "Carpentier reference). The Examiner has rejected claims 4-5, 7-8, 11, 14-20, and 24 under 35 USC §103 as being unpatentable over the Stevenson reference, the Carpentier reference, and U.S. Patent No. 6,498,656 to Matsie et al. (the "656 Matsie reference).

The Stevenson reference could not be implemented with partial print jobs because each print job is only identified by identifiers suitable to identify the entire job (e.g. the name, version number, file size, and last saved date). The Examiner concedes that this reference does not teach "calculating a uniqueness identifier" and cites the Carpentier reference as teaching this element. The Examiner also concedes that this reference does not teach partial print jobs and cites the '656 Matsie reference as

Application No. 09/517,364 Amendment dated Ocotber 12, 2005 Reply to Office action of September 9, 2005

teaching this element. In fact, none of the references, alone or in combination, teach "calculating a uniqueness identifier . . . specifically referring to said at least a portion of said printed matter, and for identifying said at least a portion of said printed matter."

The newly cited Carpentier reference was cited specifically to address the claimed element of "calculating a uniqueness identifier in a host computer" (emphasis added). The Carpentier reference uses an "algorithm (such as the MD5 hash function)" to calculate "an intrinsic unique identifier (IUI) for the file (or message digest)." Applicant found no evidence during that the Carpentier reference could calculate a uniqueness identifier for only part of the file. Applicant also respectfully submits that this reference is nonanalogous because it is not concerned with printing.

The only reference that the Examiner provides that addresses partial print jobs is the '656 Matsie reference. The relevant section is at column 6, line 49 - column 7, line 5:

"Another rule is the "reuse" rule which gives preference to a logical printer that is located in a printer controller 8a, b, c that has the greatest portion of RIP files for that print job of all the printer controllers 8a, b, c. For instance, in a print job of a multi-volume book, such as an encyclopedia, comprised of RIP files A-G, printer controller 8a may have RIP files A-C, printer controller 8b may have RIP files D, E, and printer controller 8c may have no RIP files for the print job. If all printer controllers include logical printer queues capable of handling the print job, then the "reuse" rule criteria would select the logical queue in printer controller 8a as printer controller 8a has the greatest portion of that print job. For a print job comprised of a single RIP file, the "reuse" rule would select a queue in a printer controller 8a, b, c having the single RIP file. Note that in a multiple printer controller 8a, b, c, environment, the "reuse" rule would favor selection of a logical printer having a queue in the printer controller 8a, b, c that includes the printer daemon (PD) that RIPped the print job as such printer controller 8a, b, c already has the RIPped file. The "reuse"

Application No. 09/517,364
Amendment dated Ocotber 12, 2005
Reply to Office action of September 9, 2005

rule minimizes network traffic by minimizing the need to transfer RIPped files from a common repository, e.g., storage device 10, that are already available in a printer controller 8a, b, c or to transfer RIPped files between printer controllers 8a, b, c."

At column 5, line 41, the '656 Matsie reference specifies that pointers or tokens are used to represent the RIPped files. The '656 Matsie reference does not provide any means for creating an identifier for part of the print job.

Alone or in combination, these three references fail to teach or suggest "calculating a uniqueness identifier . . . specifically referring to said at least a portion of said printed matter, and for identifying said at least a portion of said printed matter." The Stevenson reference only functions with printing entire jobs. The Carpentier reference only generates IUI's for entire files. And the '656 Matsie reference does not disclose any means for creating an identifier at all (let alone one for a calculating an identifier for a partial file). Without a process for calculating a uniqueness identifier for parts of the print job, the invention as claimed in the currently pending claims simply could not be implemented.

As the application is now in a condition for allowance, the Examiner is requested to pass the application on promptly to issue.

Please charge Deposit Account No. 50-2115 for any additional fees which may be required.

Respectfully submitted,

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